

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NORTH AMERICAN SPECIALTY)	
INSURANCE COMPANY,)	
)	Civil Action
)	Case No. 04-CV-04-10374-WGY
<i>Plaintiff</i>)	
v.)	
)	
MARY & JOSEPHINE, CORP.)	
)	
and)	
)	
MATTEO RUSSO,)	
<i>Defendants</i>)	

**ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

NOW COMES Plaintiff, North American Specialty Ins. Co., by and through its counsel, Tompkins Clough Hirshon & Langer P.A., and respectfully requests that the time period within which it must respond to Defendants' Motion for Summary Judgment be extended to and including February 8, 2006. Such extension is necessary to allow Plaintiff's counsel time to complete a post-arbitration memorandum in another matter due at approximately the same time as Plaintiff's response to Defendants' Motion for Summary Judgment, and to prepare an appropriate response to Defendants' Motion.

Counsel for Plaintiff has conferred with defense counsel, who have agreed to such an extension of time.

WHEREFORE, Plaintiff North American Specialty Ins. Co. respectfully requests that the time for responding to Defendants' Motion for Summary Judgment be extended to and including February 8, 2006.

Dated at Portland, Maine this 24th day of January, 2006.

/s/ Leonard W. Langer

/s/ Marshall J. Tinkle
BBO No. 565513

Counsel for Plaintiff
North American Specialty Insurance
Company

TOMPKINS, CLOUGH, HIRSHON & LANGER, P.A.
Three Canal Plaza
P. O. Box 15060
Portland, ME 04112-5060

CERTIFICATE OF SERVICE

I, Leonard W. Langer, hereby certify that on January 24, 2006, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send a notification of such filing(s) to the following: Joseph G. Abromovitz, Esq. 858 Washington St., Dedham, MA 02026, counsel for Defendant Matteo Russo, and Bertram E. Snyder Esq., Looney & Grossman, 101 Arch Street, Boston, MA 02110-1112, counsel for Defendant Mary & Josephine, Inc.

/s/ Leonard W. Langer

NAS/M&J
Mot Ext Time
1.24.06